BINGHAM

LEGAL INSIGHT. BUSINESS INSTINCT.

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June 25, 2011

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, DC 20554

Re: Notice of *Ex Parte* Meeting – GN Docket No. 11-117, PS Docket No. 07-114 and WC Docket No. 05-196

Dear Ms. Dortch:

On behalf of CommScope, Inc. ("CommScope") and pursuant to Section 1.1206 of the Commission's Rules, 47 C.F.R. § 1.1206, this letter provides notice of an *ex parte* meeting held on June 21, 2011, in connection with GN Docket No. 11-117, PS Docket No. 07-114 and WC Docket No. 05-196. The meeting was attended by Mr. Andrew Beck, Director - Product Development and Mr. George Marble, Director-Business Development both at CommScope (the "CommScope Representatives") as well as the following staff from the Public Safety and Homeland Security Bureau (the "FCC Representatives"): Patrick Donovan, Attorney Advisor; David Furth, Deputy Bureau Chief; John Healy, Engineer; Tim May, Analyst; David Siehl, Attorney Advisor; Jerome Stanshine, Engineer; and, via conference call, Erika Olsen, Attorney Advisor and Henning Schulzrinne, Engineering Fellow. The undersigned attended as outside counsel to CommScope.

The purpose of the meeting was to discuss emergency caller location technology issues. In particular, we discussed developments in indoor location technologies and practical considerations in deployment of indoor systems, CommScope's extensive experience in E911 location Phase II accuracy testing, as well as practical and technology issues in VoIP autolocation. The CommScope representatives presented the attached slides.

Should any additional information be required with respect to this *ex parte* notice, please do not hesitate to contact the undersigned.

Very truly yours,

/s/

Catherine Wang

Attachment
cc (by email): FCC Representatives

Boston
Hartford
Hong Kong
London
Los Angeles
New York
Orange County
San Francisco
Santa Monica
Silicon Valley
Tokyo
Walnut Creek
Washington

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COMMSCOPE®

E911 Phase II Caller Location

July 21, 2011

connect+evolve

CommScope Profile

- Worldwide manufacturer and vendor of infrastructure that connects the world and evolves with every advance in technology
  - Radio Frequency solutions for wireless networks
  - Optical and RF solutions for broadband networks
  - Wired and wireless solutions for enterprise networks

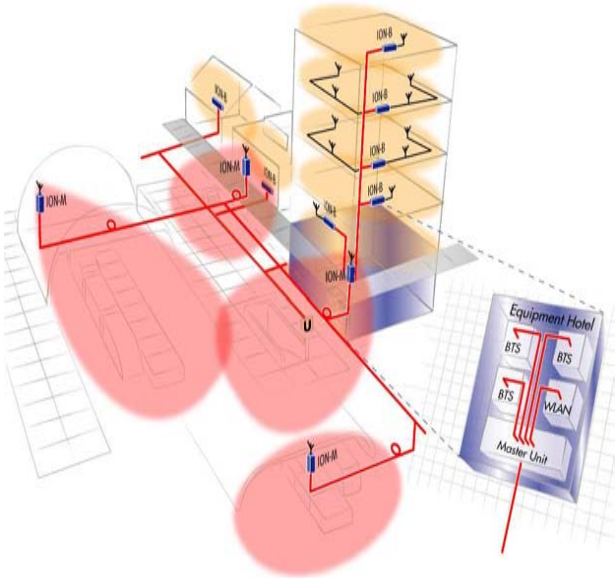
- Wireless E911 Caller Location Support for More Than a Decade
  - “Handset-based”, “network-based”, “hybrid” location technologies
  - Multi-network/multi-vendor platforms to support all networks
  - Leading carrier customer base
  - Indoor Solution

Discussion Topics

- Indoor Location
- E911 Phase II Accuracy Testing
- VoIP Autolocation

CommScope Indoor Location System

- Announced April 2011
- Deploy with DAS or as stand-alone
- Proximity detection method
- High accuracy and yield
- Works in concert with existing macro caller location systems
- No handset modification
- 2G and 3G, 4G planned



Indoor Location Considerations

(A) Is the objective to improve x-y location within structures?

(B) Is the objective to produce x-y-z locations within structures?

- Accomplishing A may not necessarily accomplish B
- Accomplishing B should also accomplish A

- Performance improvement for current E911 regulation:
  - Meet E911 accuracy objectives within structures
  - Improve yield of high-accuracy locations when A-GPS is the primary method

- CommScope's indoor solution can accomplish A and B
  - Augments location within structures and can provide a vertical component

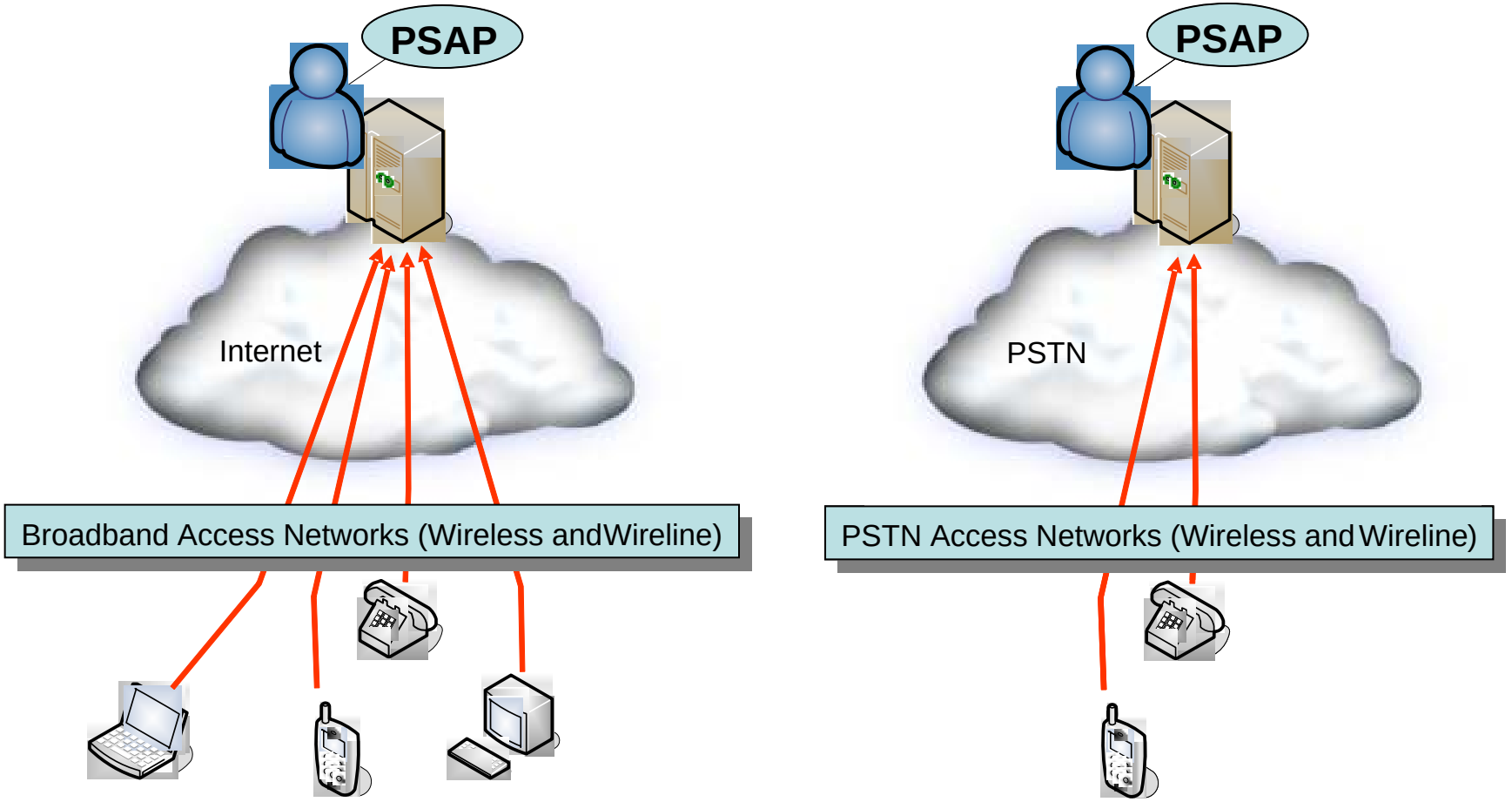
Indoor Testing Considerations

- Test point selection
  - Structure types
  - Access
  - Number of test points
- Outdoor/Indoor test point distribution
  - Blending of results indicative of real E911 call distribution
- Establishing a “ground truth” reference
- Tests need to represent accuracy/yield/latency performance with statistically significant data

VoIP Auto-location Considerations

- Fundamental Issue: Is VoIP or the Internet the equivalent of the PSTN?
  - The Internet
  - IP packets instead of circuits
  - Bytes instead of minutes
- If Internet is a PSTN equivalent, then what is VoIP?
  - One of many “applications” on the Internet
  - Not the equivalent of POTS: POTS is equally concerned with access and circuit service as with moving voice over the circuits
- Location information critical to E911
  - Fundamental to call routing and dispatch
  - POTS: determined from calling-line ID; static relationship.
  - Cellular: determined from serving network; dynamic determination.
  - IP: determined from serving network; dynamic determination (NENA i2, i3, ECRIT).

Internet and PSTN comparison



Thank You